

BEYS LISTON & MOBARGHA LLP
Michael P. Beys

December 15, 2016

VIA ECF & FACSIMILE (212-805-7986)

The Honorable Paul G. Gardephe
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: *United States v. Kaleil Isaza Tuzman*, No. S7 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We respectfully submit this letter on behalf of Mr. Isaza Tuzman to seek permission for him to travel to Eastern Pennsylvania to spend the Chanukkah holiday with his close relatives there. The Government does not object to this request. Although Pretrial Services generally does not consent to such requests as a policy matter, it has no specific objection in this case.

Specifically, Mr. Isaza Tuzman seeks permission to travel by car on December 23 and return on December 27, 2016. He would stay each night at his uncle Martin Tuzman's home at 707 Rambler Road in Elkins Park, where he has stayed in the past, and would attend religious services and family gatherings in the Philadelphia area (including Southern New Jersey). All other terms and conditions of home detention would remain in place, and Mr. Isaza Tuzman would remain at all times under the supervision of Pretrial Services.

There have been several prior, approved requests for the defendant to travel outside this District (ECF Nos. 94, 100, 112, 118, 122 and 124), and each time he left from and returned to the District as scheduled and without incident.

We thank the Court in advance for its consideration.

Respectfully Submitted,

/s/ Michael P. Beys

Michael P. Beys, Esq.
Counsel for Kaleil Isaza Tuzman

cc. All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via email)